

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**SEPTEMBER 16, 2013**

In the Matter of	)	
Modernizing the E-rate	)	WC Docket No. 13-184
Program for Schools and Libraries	)	

**COMMENTS BY JAMES W. IDOL, E-RATE SUPERVISOR, KNOX COUNTY SCHOOLS**

**RELATED TO THE E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING**

## **INTRODUCTION AND OVERALL SUPPORT FOR THE E-RATE PROGRAM**

I am writing to provide Comments to the FCC on the E-Rate NPRM, proceeding 13-184. The E-Rate has been of great importance the Knox County School District because it has provided the connectivity and infrastructure to our students and teachers gain access to a wealth of online resources, to communicate and collaborate, and to develop the 21st century skills necessary for college and career.

As a Technology Director in Tennessee and a board member of the Tennessee Educational Technology Association, I recognize that seamlessly infusing digital learning throughout the school curriculum is a pre-requisite for students to graduate from high school with the skills and knowledge they need to succeed in today's global economy.

Access to high speed broadband is the key for modern teaching and learning to occur in all schools across the country. Our district is no different. We use digital resources to personalize learning, provide online classes, meet common core state standards, administer online assessments, and make data driven decisions.

One of our most important examples of digital learning in the Knox County School district is a project we have called the RIVER Project. This project provides every high school with a learning space configured to provide Robust Interactive Virtual Educational Resources. These spaces are filled with video and audio resources to engage and connect learners.

The resources deployed allow for shared instruction, connectivity to national experts, virtual field trips, and facilitates communication among our students and staff. These spaces provide the resources for sharing of data and expertise between schools in our district and with surrounding districts in Tennessee.

These exciting learning environments are dependent on quality, dependable connectivity and require a significant amount of bandwidth for communication between rooms.

With this type of exciting project becoming the norm and with emerging 1:1 or 2:1 initiatives in our district, our network is currently barely keeping up with demand, and the need for a high-speed reliable connectivity is only going to increase in the near future.

Clearly, the E-rate program has been a phenomenal success in bringing Internet access to almost every classroom in America. In the last funding cycle applications from schools and libraries totaled more than \$5 billion, more than double the available funding.

As many have previously commented, the E-Rate program is a program succeeding in its mission. We agree that as the FCC moves forward with this NPRM, it is prudent to remain focused on the fact that E-Rate is a program that works and that any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential. The current program, while needing some marginal updates to its structure, is most strained by increasing demand for E-Rate-supported services and persistently low funding. The single most effective step

the FCC can take to bolster E-Rates current and future success is to provide \$5 billion in funding, an amount commensurate with current demand.

We concur with others that this NPRM is an opportunity to tackle the important work of expanding a successful program, and would be concerned by any efforts that frame the conversation as one aimed at 'fixing' something. E- Rate is not a broken program that needs to be fixed; it is a successful program that schools continue to rely on. In our district, it is a program that must continue to provide funding critical for telecommunications and connectivity.

#### **E-RATE AND THE NEED FOR FLEXIBILITY**

We again agree with the AASA and AESA comments and strongly encourage the FCC to do so in the context of autonomy and flexibility at the local level. Desired behavior should be incented. The program should not become being overly prescriptive. For the program to continue to be the success it has been for over 15 years, districts must remain in control of deciding which services to purchase through E-Rate.

Flexibility is important. It is imperative that the Commission and USAC recognize that what works in one district will often not always work in another district, even if the districts seem statistically identical. Flexibility is the best way to strike a balance between meeting federal goals and recognizing the unique opportunities and obstacles in each school and community. Flexibility allows the local school or library to use their E-Rate dollars in the way that leverages the most access they can obtain in the context of their broader education and technology goals.

## **OVERALL FUNDING LEVEL MEETING PROGRAM DEMAND (§173)**

In our school district, the E-rate program has single-handedly allowed us to expand connectivity to 100% of our students and teachers. Knox County has It is no secret that E-Rate funding levels have not kept pace with national current bandwidth needs. We urge you to consider raising the E-rate funding level to at least \$5 billion per year, which is close to the average demand level for each of the past two years.

The single most effective thing the FCC can do to bolster the E-Rate program's effectiveness in not only providing connectivity, but also expanded connectivity, is to more adequately fund E-Rate. The E-Rate was level-funded at \$2.25 billion between 1997 and 2011.

In its 2010 NPRM, the FCC itself recognized the inadequacy of the current E-Rate funding level, writing that 'Demand for funding far exceeds available funding every year.' And 'In future years...it is likely that requests for telecommunications and internet access services will exceed the cap, with the result that no funding for internal connections will be available for any applicants.'

## **GOALS AND MEASURES**

### **Proposed Measurements (§20-40)**

We appreciate the efforts to ensure performance and availability of broadband to students. We support SETDA's connectivity metrics. We believe that this must be a priority for the program. Nevertheless, the topic is complex and one size will not fit the needs of all applicants. It is reasonable for applicants to provide general information in regard to broadband access goals as a part of the application process.

We do not support nor see the benefit of having dedicated equipment measuring network performance whether it be provided, subsidized or required. This implementation of such a proposal seems to only divert much needed funding and would only serve the goal of the manufacturer of a measurement device (§34).

Service providers can typically provide that information and in our experience, the utilization may fluctuate wildly on any given day. Gathering that information from Service Providers would be a more efficient and more accurate measure of network use (§35).

We do not support the concept of attempting to develop a measure by which educational impact is a measure of the success of the program. To our understanding, this was never the goal of the program. The connectivity and resources provided to classrooms and libraries through the E-rate program are tools. The impact and the value of the program are the opportunities that are afforded to the classroom.

The impact of the tool must lie with the craftsman and not within the tool itself. There is little research that defines the efficacy of pencils as a direct or proportionate relationship to gaining knowledge but there is plenty of common-sense understanding and research of the ramifications to learning when pencils are not available.

It would be our desire that the E-rate program focus more on making top-quality, sharpened “pencils” ubiquitous and not spend time counting “pencils”, measuring “pencils” to see if they had be used, or trying to determine whether the “pencils” were developing writers, artists, or scribblers. We truly believe that given the opportunity, our students and teachers will take care of that part. (§40).

**GOAL 1: ENSURING SCHOOLS AND LIBRARIES HAVE AFFORDABLE ACCESS TO BROADBAND**

**B: Funding for Broadband Connections**

**2. Phasing Down Support for Certain Services**

We do not support the phasing out of basic telephone services, local and long distance, or basic VoIP. Many of our schools still depend on these telecommunication systems.

We do not support the elimination of support for Internet access via cellular data plans. In many cases, these services provide connectivity in areas that we cannot cost-effectively reach otherwise.

Web hosting and hosted email services have proven to be mission critical services for our district. We would be a proponent of continuing E-rate support for these services.

Basic maintenance of internal connections has been unwieldy due to lags in review and funding. Nevertheless, we feel these can be valuable services and should, when appropriately administered, serve to aid in the preservation of Priority Two funding by helping maintain rather than replace network devices. We support continuing these services as a portion of the program.

### **C: Ensuring Equitable Access to Limited E-rate Funds**

#### **1. Modifying the Discount Matrix**

We support revising the discount matrix to increase certain applicants' matching requirements through a phase-in process. We believe that the Rural and Urban discount matrix should be equivalent.

We do not support the modification of the discount matrix for services currently listed as Priority One. In most cases, these represent ongoing telecommunications and Internet services costs. Our district is just beginning to recover from a recessed economy and cannot pay more for current necessary services much less expand the services to the levels needed. We do not support abandoning the discount matrix in lieu of a discount calculated as NSLP percentage. (§ 117);



## **2. Support Based on District-Wide Eligibility and Application by School District**

We oppose the NPRM proposal that E-rate discount calculations to be based on a simple average of the District's NSLP enrollment but urge the commission to continue use the current weighted average approach using each school's discount as part of the calculation. While this might expedite review time, we believe that this method could have a detrimental effect for low-income schools in large school districts while increasing the discount rate for wealthier schools in the district. Maintaining the current weighted calculations system will help districts continue to target the neediest schools without penalizing the district based on overall size. (§ 126)

## **3. More Equitable Funding for Rural Schools and Libraries**

We could support changing the discount matrix for Priority Two to a maximum of 80% to assist in providing more equitable access to Priority 2 funding (§ 133).

## **4. Setting Budgets or Limits**

We do not support a per-student or per-building cap on funding into the discount matrix. We have studied and were cited in the Funds for Learning data. We find that, while the data was accurate, it misrepresents the actual situation. The large request made by Knox

County Schools in the 2012 funding year studied is the result of essentially duplicative requests for projects that are either in review or in appeal for two previous years (§135).

The NPRM proposes the establishment of a per-student/per-district cap for each funding year. We concur with the AASA and AESA comments in this regard and also oppose per-student based funding because it fails to recognize high-cost service factors that often impact our smaller schools.

Everything from cost of connectivity to accessing maintenance has higher costs in small and geographically isolated locations, and per-pupil funding would unfairly shortchange all of these districts and the students they serve.

Budget needs are not consistent and tend to ebb and flow in regard to trends and changes in the technological landscape. To set a limit seems to only create another vehicle that will need constant monitoring and escalation. There is also an assumption that in urban areas prices tend to be lower because of availability and competition. This has not been our experience. We find that many potential vendors do not elect to submit bids to participate in the program

Further, the E-Rate program was designed to connect schools and libraries, not fund individual children. We, too, are concerned by a

proposal to make E-Rate funding portable, as it could potentially undermine the overarching goal of connecting schools.

Streamlining the program, reducing the administrative burden, and speeding funding commitments would do much more to benefit the program than would setting budget limits. Further, we believe that if the funding cap were increased the need for funding caps or a *di minimus* amount of funding would be alleviated (§ 136-139)

Further, the E-Rate program was designed to connect schools and libraries, not fund individual children. We, too, are concerned by a proposal to make E-Rate funding portable, as it could potentially undermine the overarching goal of connecting schools.

It creates a situation where high-need/high- poverty schools could see enrollment and, consequently, funding decline, further limiting the ability of the high-need school to afford even the most basic of telecommunications connectivity.

## **5. More Equitable Access to Funding for Internal Broadband Connections**

The 2/5 rule should remain in effect as this allows for procurement of equipment that has a standard three-warranty. Further, the 2/5 rule allows districts to better deal with changes in the ever-changing

technological landscape that occur within a three-year timeframe. (§ 146)

## **6. Simplified Allocation of Funds to All Schools and Libraries**

We strongly oppose allocating funds to all eligible schools and libraries through a fixed dollar amount. This essentially turns a very support mechanism into a block grant that we ultimately feel would be detrimental to the efficacy of the program. It creates a situation where high-need/high-poverty schools could see enrollment and, consequently, funding decline, further limiting the ability of the high-need school to afford even the most basic of telecommunications connectivity. (§ 149)

## **GOAL 2: MAXIMIZING THE COST EFFECTIVENESS OF E-RATE FUNDS**

### **B: Improving Consortium Purchasing**

We believe that the encouragement and use of consortium purchasing can be beneficial but should be at the discretion of the school district. To that end, we are in support of any “consortia” friendly regulations that make this system of purchasing easier to accomplish (§180).

We do not support the requirement to use state master contracts. These contracts often do not receive the same scrutiny of local procurements and are not always targeted to the needs of the district. This absolutely should be at the discretion of the local school district and guided only by state and local

procurement regulations (§182).

**C: Encouraging Other Types of Bulk Buying Opportunities**

We do not believe that USAC is in a position to facilitate bulk-buying programs that would be beneficial to most applicants. Further, the procurement systems used by USAC to establish such programs may not conform to state and local procurement regulations and consequently, may not be legal procurement vehicles (§187).

**D: Increasing Transparency**

We are concerned that in the effort of streamlining the process that more reporting requirements would become part of the application process (§196-197). While we would support making available the prices that applicants pay for eligible services, the maintenance of that information must lie either with USAC or the Service Providers. Prices constantly fluctuate and are dependent on volume, location, and other factors that could be misleading to applicants if not appropriately documented and updated regularly.

We support that concept that USAC of helping identify best practices for the sake of sharing throughout the program participants (§198). Our reservation is again the “blessing” of one process versus another. The disparity of requirements from state to state, district to district are significant and would seem to be an unwieldy activity for USAC to accomplish well. This would probably be better handled by organizations such as Tennessee Educational

Technology Association or associations such as SECA. These outreach activities should be supported financially by the program.

We believe that it should not be the responsibility of USAC to employ technical expertise to assist in the planning and design of networks. While facilitating training in these areas might prove beneficial, there would appear to be an extraordinary opportunity for conflicts of interest and “most favored nation” issues that are not currently issues for the program (§200).

Again, this is an activity that with the support of the Commission could be better handled and coordinated by either SECA or State Technology Associations such as TETA (§201).

#### **E: Improve the Competitive Bidding Process**

We do not find the current competitive bidding process particularly problematic. While we have no issue with the program establishing guidance in this regard, we feel strongly that state and local procurement regulations must be the guide in competitive bidding activities (§206).

#### **F: Efficient Use of Funding**

We find the current program rules in consort with state and local procurement regulations are more than sufficient to ensure cost-effective procurements, and see no need for the expansion of such rules within the program. In fact, we already find program rules in conflict with state and

local procurement policies that cause additional burden to us as applicants. Further, we cannot imagine a reasonable mechanism by which USAC could effectively monitor the stated services without a significant increase in the burden on all applicants. (§211-213)

“Bright-line” testing is not necessarily indicative of the worth, use, or cost efficiency of a discrete service and should not be used for benchmarking.

Requiring the use of all services regularly indicates that the proposed service is not of the capacity to facilitate the natural growth of use over time. It seems that the enforcement of such a policy would fall again as a burden to the applicant and is unwieldy at best. (§214-2115)

We do believe that in some cases, services have propagated in the Priority One space because funding in that space was assured. Nevertheless, many of these services have provided clear benefits to applicants across their district and have replaced expensive Priority Two deployments that might have impacted only a portion of the students in the district (§215).

We support that concept of assessing the cost-effectiveness of services over a 4- or 5-year term. Many times new services are under utilized when initially deployed. This can sometimes mistakenly indicate the service is not beneficial when assessed in the short term. We find our user base requires training and support to ensure that any new service reaches its potential. (§216)

### **GOAL 3: STREAMLINING THE ADMINISTRATION OF THE E-RATE PROGRAM**

As potentially the second most important topic in the NPRM, we support the Commission efforts to enhance the efficiency and speed at which reviews, funding decisions and appeals are processed.

#### **A. Electronic filing of FCC Forms and Correspondence:**

The NPRM proposes to improve the online application system and require that all applicants file forms electronically. We generally supporting the use of electronic filing in most instances. To that end, we support SECA's proposal that all of an applicant's forms and correspondence be available from a centralized portal (§229). Nevertheless, please recognize that e-filing may not be feasible for applicants that lack adequate bandwidth for online filing, have a network failure at a critical moment, or for replacement contracts that are filed out-of- cycle.

#### **B. Increasing the Transparency of USAC's Processes:**

We agree with the SECA position (§232) that the longer a decision is pending, the more status update information should be made available on USAC's website to the affected parties. We have had many instances where we were contacted with great regularity in the beginning of a review cycle only to have the conversation go dark for months before a decision letter was received or additional conversations occurred.

It has become clear that applicants operate under very strict deadlines for



every request with the ultimate penalty of losing much needed funding.

However, the reverse is not true.

Currently, any review discussion may go dark for 8 to 12 months at a time with the applicant hearing nothing from USAC. We favor SECA's proposal regarding the 90-day limit for USAC to undertake specific actions once all requested documentation is in hand. Faster decisions will relieve a portion of the administrative burden, avoid the pitfalls of waning contracts and technology changes and, mostly importantly, speed the deployment of resources for the use of the students.

Additionally, we concur with the SECA proposal that USAC should provide additional levels of detail in its "Application Status" tool on its website to provide applicants with a better understanding of where their application is in the review process.

Further, in cases where USAC is waiting for an applicant submission, it seems reasonable to indicate as part of the application status that it is "awaiting applicant's response to USAC's request on [date]." In short, any increase in the transparency of USAC processes will allow schools and libraries to better marshal their resources to manage the project.

### **C. Speeding Reviews of Applications, Commitment Decisions, & Funding Disbursements:**

In our opinion, speeding the review, commitment & funding disbursements

reflects the second highest important priority that the commission could address (...the first being the underfunding of the program).

It is our perception that the review process seems to be becoming longer each cycle (§233). In our experience, it is no longer uncommon for the review to extend 18-24 months beyond the initial application. Granted, in our particular case, Priority Two applications are often complex but it must be noted that with that magnitude in the lag in decision-making, the opportunity for other events to occur that prolong the implementation process increases.

At this writing, it is not uncommon for our district to work actively in a minimum of four funding years. When applications from previous years have not completed the review cycle or issues from previous years have not been resolved

The review process for Priority Two requests quite often crosses from one fiscal year into new fiscal cycles. When applications from previous years have not completed the review cycle or issues from previous years have not been resolved, it becomes incumbent upon applicants to file duplicative applications to ward off potential price and product changes, to reflect changes in need, or to reflect enhancements in the technology landscape.

This spiral ties up much needed funding,

It is not uncommon for the review lag to span a manufacturer's refresh cycle.

This results in newer, more desirable or efficient products that were not

included in the original application. Assuming that original products and services are still contractually available or that the new products can be provided, requires the applicant to amend contracts and execute of service substitution requests. The filing and review of these documents often adds a minimum of nine additional months to the deployment.

Further, delays of this magnitude often threaten the validity of contracts that are reaching expiration dates and/or renewal limits.

All of these events delay the implementation of projects and the deployment of mission critical services to our students and patrons. These delays are tying up millions of dollars in the program fund.

That said, rushing through the review process to meet an arbitrary deadline (§234) has numerous pitfalls and consequently, we do not support the establishment of any deadlines as a solution to the need for speedy review.

We oppose limiting the number of opportunities and length of time applicants have to submit information in response to USAC's requests. (§237). While the current process is sometimes time consuming and causes lags in funding, the resultant conversations are beneficial for both applicants and their reviewers. The process as it stands typically leads to more logical and reasonable decisions and it would seem counter productive to limit this important dialog.

From our point of view, it is the redundancy of the conversation that should

be eliminated. We are asked to answer the same question in regard to our applications time after time. Often, after a telephone conversation, the reviewer understands that the information they sought was indeed already present in the Item 21. Even when the issue is clarified, we are often asked to resubmit the answer in written form for the sake of documentation.

We support streamlining the E-Rate application process so as to minimize administrative burden (§238). Our district navigates the several forms in completing the E-Rate application process each year. Our human resources to file and maintain the current annual requirements is fulfilled by a department of only two people for a district of serving almost 60,000 students. This annual paper trail absorbs countless hours. The complexity of the program has at times required us to incur the additional expense of a consultant with expertise in the cumbersome process. Even with a consultant, we continue to find it necessary to file appeals for denied applications because of errors in the application process or systems that are not consistently applied.

We urge that it be noted that we find many comments and proposals throughout this NPRM that will significantly increase the already unwieldy administrative burden for applicants. Multiple filing windows, 10-year document retention, and submittal of complex bid submittals will only tend to increase the burden to our already straining resources to support the program.

To ensure consistency and efficiency in procurement process, we typically issue multi-year contracts. We support the concept of the “evergreen” 471 (§239-246).

We do believe that the maximum contract period (§243) should be consistent with state and local procurement regulations that in our case would be 5-year terms. We believe that if state and local procurement regulations are followed then there is no need for additional regulation in regard to contract term limits, types of services bound by the contract, and/or caps on the quantity of contracts managed by the applicant (§244-246).

The establishment of multiple filing windows (§247) could provide additional information regarding the availability of Priority Two funding which could in turn be advantageous to applicants so far as determining the viability of the application. As stated above, currently with only one filing window, we are working in four discrete funding cycles that are in varying stages of “done”. This proposal impacts contractual agreements, timing of procurement tasks and other administrative functions that would seem to be doubled with the addition of another filing window. On balance, this proposal will certainly increase the administrative burden on the LEA and consequently, we oppose it.

**D. Simplifying the Eligible Services List:**

In concept, we support the elimination of the regulatory categories (§250) for E-rate services but feel that there should be further study and discussion in regard to this proposal that is not sought in the NPRM. Moving the decision of which services falling into which priority to the applicant could prove to be confusing where current Priority One and Priority Two services reach a nexus.

So far as CIPA compliance (§251) either approach appears to be viable. We would support the SECA position that applicants who prefer to continue filing the FCC Form 486, be given that option as well and a check box to designate this preference can be included on the FCC Form 471.

#### **F. Effective Use of Unused Funding:**

The most effective way to effectively use unused funding is to first put in place processes that insure timely distribution of funds. From our experience the delay in the issuance of funding commitments (§256) absolutely is a contributor to the amount of unused funds since the delay will often result in duplicative applications that will reflect cost increases. Finding ways to expedite funding commitments would be a much more productive activity than spending effort to identify applicants who have applications that are inaccurate. These issues should be resolved in the review process. (§256).

#### **G: Invoicing and Disbursement Process**

We support the direct payments to applicants under Form 472 (BEAR)

process. (§ 261-262). We feel that this proposal that would streamline the disbursement process for both applicants as well as our vendor partners.

#### **H: Streamlining the Appeals Process**

We have found the current appeals process equitable (§266-268) and would support the continuation of the current process in concept. Deriving efficiencies to reduce the backlog would be beneficial but we do not feel the process as a whole is a “broken”. We do believe the it would be helpful at times for USAC to have more latitude to make reasonable instead of literal interpretations of lesser appealable decisions. We feel this could materially reduce the backlog in appeals to the commission.

We could, with additional details as to scope and process, support the ability for staff to dispose of some appeals as a reasonable effort to reduce the backlog so long as the staff decision was also contestable to the Commission (§269).

We do not support the concept of issuing of a decision regarding any appeal without the benefit of analysis. Further, we do not support the limitations on the number of opportunities that an applicant has to contest adverse findings.

### **OTHER OUTSTANDING ISSUES**

#### **A. The Children’s Internet Protection Act**

We support expanding CIPA regulations to include any electronic device that has the capability to access the Internet. CIPA rules should apply only

to those devices that are connected to networks which are funded in part by the E-rate program. It is impossible for our district to exert control of personal devices that enter the campus. Unless those devices are allowed to connect to the campus network, the district cannot enforce a filtering policy.

We find it problematic to ensure that devices, even if owned by the school district, that are used outside of the E-rate subsidized district network to be effectively monitored and filtered. While we are working to determine if there are cost effective solutions to this issue, we do not believe that devices in this scenario should be subject to CIPA rules.

#### **D. Additional Measures to Prevent Waste, Fraud and Abuse**

In our opinion, if one of the goals of this NPRM was to assist applicants by relieving a portion of the administrative burden posed by the current program, then proposals in this section of the NPRM are counter-productive to that goal. We find little in this section that truly would provide any additional measure to further prevent waste, fraud or abuse but rather simply increase the administrative burden to the applicant.

##### **1. Extending the E-rate Document Retention Requirements**

We can point to no other governmental or educational program that requires a 10-year documentation retention policy. Even the Internal



Revenue Service does not require personal tax information to be retained 10 years.

Applicants are asked to refresh Technology Plans on a three-year cycle. Equipment is currently required to be in service prior to disposal for 5 years. Documentation that is two to three times these guidelines cannot possibly afford the program any benefit or clarity. Consequently, we believe that documentation that has aged to this point is no longer relevant and serves only as a burden to the applicant and to the program.

We can only imagine that this proposal is reflective of the backlog of appeals that are currently prevalent in the system. The solution is to more efficiently clear any appeals or reviews and move the program forward.

The management of the current 5-year document requirements can be awesome requiring consistent effort. We strongly oppose the 10-year document retention policy. (§295-297).

## **2. Documentation of Competitive Bidding**

We wonder if the author of this request actually understands the magnitude of this request and the amount of data storage that would be

required to maintain all the documentation submitted as part of a thorough bidding procedure.

We are already required to keep documents related to the initial bid from the successful proposers as a portion of our local document retention policy. In several recent reviews, we have been asked to provide this information to assist with the evaluation of our funding requests.

In many follow-up conversations, it has often been indicated that the magnitude of that portion of the documentation was “over-kill” and did not effectively assist the reviewer in arriving at a decision.

This proposal seems to only increase the burden to the applicant by requiring the storage and maintenance of documents that are, in all respects, useless.

## **CONCLUSION**

I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by ensuring the future of this successful program.

As a technology manager for our school district, I respectfully and urgently request the FCC to consider the current demands on the program before considering any global change in the scope or structure of the program. It is important that the underlying program operate more efficiently by streamlining the application

process and refrain from creating new demands on school districts who are already stressed for district resources. If anything, the program is overly regulated. We hope this NPRM is an opportunity to relieve a portion of the burden to school districts while maintaining the integrity and viability of the program.

Foremost, we urge the FCC to consider an increase in funding for the E-Rate program to at least \$5 billion to meet the ever-growing demand for technology and communications in our classrooms.

We must bear in mind as we address these impending changes that the overarching tenant is that all students need access to high speed broadband. Our nation's future depends on their success and their success depends on these opportunities.

*Thank you for the opportunity to participate in a dialog that will impact our children's future and the opportunity to work together to make the E-rate program better for the next decades of its existence.*

Sincerely,

James. W. (Jim) Idol, Supervisor of E-Rate & Special Projects

Knox County School District, Knoxville, TN